

1 Harry I. Johnson III (SBN 200257)
2 *johnson.harry@arentfox.com*
3 Paul A. Rigali (SBN 262948)
4 *rigali.paul@arentfox.com*
5 **ARENT FOX LLP**
6 555 West Fifth Street, 48th Floor
7 Los Angeles, CA 90013-1065
8 Telephone: 213.629.7400
9 Facsimile: 213.629.7401

10 Attorneys for Defendant
11 DIESEL U.S.A., INC.

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION
17

18 MEGAN LABRADOR, individually and
19 on behalf of all others similarly situated,

20 Plaintiff,

21 v.

22 DIESEL U.S.A., INC., a New York
23 corporation; and DOES 1-100, inclusive,

24 Defendant.

Case No. CV 11-00014 CRB

**STIPULATED REQUEST FOR ORDER
CHANGING TIME OF CASE
MANAGEMENT CONFERENCE AND
[PROPOSED] ORDER**

Judge: Hon. Charles R. Breyer
Courtroom: 8, 19th Floor
Case Removed: Jan. 3, 2011

1 Subject to the approval of the Court, plaintiff Megan Labrador, on behalf of herself and all
 2 putative class members ("Plaintiff"), and defendant Diesel U.S.A., Inc. ("Defendant"), hereby
 3 stipulate as follows:

4 WHEREAS, on March 8, 2011, the Court issued the "Order Setting Case Management
 5 Conference," ordering that case management conference in the above-captioned action be held on
 6 Friday, April 15, 2011, at 8:30 a.m.;

7 WHEREAS, counsel for the Parties are actively engaged in litigation in the matter, *Ryan*
 8 *Greko et al. v. Diesel U.S.A., Inc. et al.* Case No. 3:10-cv-02576-RS in the United States District
 9 Court, Northern District of California, San Francisco Division (the "Greko Action");

10 WHEREAS, Defendant's motion for summary judgment and plaintiff Ryan Greko's
 11 motion for class certification in the Greko Action, are scheduled to be heard on May 5, 2011;

12 WHEREAS, in light of the May 5, 2011 hearings in the Greko Action, the currently
 13 scheduled case management conference in the above-captioned action is inconvenient for the
 14 Parties;

15 WHEREAS, a three-week continuance of the case management conference will not
 16 seriously impact the schedule in the above-captioned action;

17 WHEREAS, counsel for Plaintiff has authorized Defendant to affix her electronic
 18 signature to this Stipulation;

19 THEREFORE, the Parties hereby submit this Stipulated Request for an Order Continuing
 20 the Case Management Conference to May 6, 2011, or to another date or time convenient to the
 21 Court's calendar. The Parties also request that the deadlines to meet and confer in advance of the
 22 conference and to file a joint case management statement be continued according to the

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 date of the continued case management conference and the Court's Order Setting Case
2 Management Conference, dated March 8, 2011.

3
4 Dated: March 17, 2011

ARENT FOX LLP

5
6 By: /s/ Paul A. Rigali
7 Harry I. Johnson III
8 Paul A. Rigali
9 Attorneys for Defendant DIESEL U.S.A., INC.

10 Dated: March 16, 2011

THE LAW OFFICES OF DANIEL FEDER

11
12 By: /s/ Claire Cochran
13 Daniel S. Feder
14 Claire Cochran
15 Attorneys for Plaintiff MEGAN LABRADOR

16
17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18
19 Dated: March 18, 2011

20
21 The Hon. Charles R. Breyer

